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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LINDA BUNDY,

Plaintiff,

v.

LAS VEGAS VALLEY WATER
DISTRICT, DOE INDIVIDUALS I through X,
inclusive; and ROE CORPORATIONS I through
X inclusive;

Defendant.

Case No. 2:17-CV-02936-RFB-PAL

**STIPULATION FOR EXTENSION OF
DISCOVERY DEADLINES**

(First Request)

The above named parties, by and through their respective counsel of record, hereby submit the following Stipulation for Extension of Discovery Deadline (First Request). This is the first stipulation for extension of discovery deadlines in this case.

This request includes extensions of all pending pre-trial deadlines, including deadlines for initial expert and rebuttal expert disclosures under Rule 26(f)(3) and LR 26-1, dispositive motions, the interim status report, and joint pretrial order. The present and proposed new dates for these deadlines are set forth in Section D below. The extension is necessary to accommodate LVVWD's request for documents from third parties pertaining to damages and the parties' review of the documents pertaining to damages alleged in this case.

A. DISCOVERY COMPLETED TO DATE

On March 26, 2018, the parties held a Rule 26(f) conference. The proposed Discovery Plan and Scheduling Order was filed on April 16, 2018 and approved by this Court on the same day. After the court's approval of the Discovery Plan and Scheduling Order, the parties both served their respective initial Rule 26(a)(1) disclosures on April 20, 2018.

1 On April 17, 2018, LVVWD served Plaintiff with interrogatories and requests for
2 production. Plaintiff served her responses to the interrogatories on June 4, 2018 and her responses to
3 the requests for production on June 6, 2018. Based on her responses, on June 20, 2018, LVVWD
4 served requests on third parties for Plaintiff's employment and medical. On June 25, 2018, LVVWD
5 served requests on the IRS for Plaintiff's tax records.

6 **B. DISCOVERY THAT REMAINS TO BE COMPLETED**

7 LVVWD has yet to receive the requested medical, employment, and tax records. Based on
8 those records, the parties will need to determine the need to disclose any experts. Lastly, the parties
9 will need to complete the deposition of Plaintiff, LVVWD's Rule 30(b)(6) designee and employees
10 with knowledge of Plaintiff's employment, and experts. Depending on the information obtained
11 during discovery, the parties may propound additional written discovery, serve additional document
12 subpoenas, and depose additional witnesses.

13 **C. REASONS WHY DISCOVERY HAS NOT BEEN COMPLETED**

14 With the July 2, 2018 initial expert disclosure deadline less than a week away, the parties are
15 not able to disclose an expert under that deadline. The requested medical, employment, and tax
16 records pertain to Plaintiff's damages and are instrumental to the parties' determination of whether a
17 damages expert is warranted. It is uncertain whether the parties would obtain those documents
18 before July 2, 2018. If those documents arrive before July 2, 2018, it is uncertain whether any
19 experts can review those records and provide an opinion in time.

20 The parties did not request the instant extension sooner than 21 days before the current initial
21 expert disclosure deadlines as the parties did not realize until recently that there was a need to obtain
22 the third-party records prior to consulting with and disclosing an expert on damages. Good cause
23 therefore justifies a short extension.

24 Accordingly, the parties request that the court extend the discovery deadlines by 30 days to
25 allow sufficient time for the parties to obtain and review third-party records pertaining to Plaintiff's
26 damages and to determine the need for any expert disclosure.

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1 **D. PROPOSED DISCOVERY SCHEDULE**

2 Pursuant to LR 26-1, the parties propose to extend the current deadlines and jointly submit
3 the following to the court:

- 4 **1. Discovery Cut-Off Date:** The current deadline to complete discovery is August 29,
5 2018. The parties propose to extend the discovery deadline by 30 days, which will make
6 the new discovery cut-off date September 28, 2018.
- 7 **2. Deadline for Amending Pleadings or Adding Parties:** The deadline for amending
8 pleadings and adding parties was May 31, 2018. The parties do not propose an extension
9 of this deadline.
- 10 **3. Rule 26(a)(2) Disclosures:** The current deadline to disclose initial expert witnesses and
11 reports required under Rule 26(a)(2) is July 2, 2018, and the current deadline to disclose
12 rebuttal expert witnesses and reports is August 1, 2018. The parties propose to extend
13 those deadlines by 30 days, which will make the new deadline to disclose initial expert
14 witnesses no later than August 1, 2018 and rebuttal expert witnesses no later than August
15 31, 2018.
- 16 **4. Dispositive Motions:** The current deadline for filing dispositive motions is September
17 28, 2018. The parties propose to extend this deadline by 30 days, which will make the
18 new deadline for filing dispositive motions October 26, 2018.
- 19 **5. Interim Status Report:** The current deadline to file the Interim Status Report is July 2,
20 2018. The parties propose to extend this deadline by 30 days, which will make the new
21 deadline for filing the Interim Status Report August 1, 2018.

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6. **Pre-Trial Order:** The current deadline to file the Joint Pretrial Order is October 29, 2018, unless otherwise suspended under LR 26(e)(5). The parties propose to extend this deadline by 30 days, which will make the new deadline to file the Joint Pretrial Order November 28, 2018. In the event dispositive motions are filed, the deadline for filing the joint pre-trial order shall be suspended until 30 days after the decision on the dispositive motions or until further order of the court.

Dated this 26th day of June, 2018

CALLISTER & ASSOCIATES

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Dated this 26th day of June, 2018

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ORDER

IT IS SO ORDERED:

Terry A. Feen
UNITED STATES MAGISTRATE JUDGE

DATED: July 10, 2018